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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

DONNIE WOODRAL,

Plaintiff,

v.

COUNTY OF STANISLAUS, et al.,

Defendants.

Case No: 1:20-cv-00372-NONE-BAM

**STIPULATION & ~~PROPOSED~~ ORDER
TO MODIFY SCHEDULING ORDER**

WHEREAS, the Current Scheduling Order has the Close of Expert Discovery set for June 7, 2021.

WHEREAS, the parties had scheduled the two expert deposition to take place the first week of June, 2021.

WHEREAS, Plaintiff's counsel unexpectedly had a trial rescheduled and take place from May 17-May 28, 2021.

WHEREAS, Plaintiff's counsel's schedule has been severely impacted by the trial taking place and caused him to be unable to accomplish and conduct the expert depositions.

WHEREAS, Plaintiff's expert has been called to several trials due to the return of trials after COVID-19 restrictions lifted and has been unavailable to attend his deposition on any of the dates previously noticed by defense counsel.

WHEREAS, the parties met and conferred and agreed to reschedule the depositions for July or early August and extend the date to complete expert discovery to August 16, 2021 for the purposes of completing expert depositions.

WHEREAS, the current case schedule is as follows:

Expert Discovery Deadline – 6/30/2021

Deadline to File Dispositive Motions – 9/7/2021

Pretrial Conference – 1/24/2022

WHEREAS, the parties propose to modify the schedule as follows:

Expert Discovery Deadline – 8/16/2021

Deadline to File Dispositive Motions – 10/5/2021

Pretrial Conference – 1/24/2022

WHEREAS, for all the aforementioned reasons the parties agree to stipulate and respectfully request to modify the Scheduling Order in order to complete the expert depositions by August 16, 2021 and move the filing deadline for dispositive motions to 10/5/2021.

Date: July 23, 2021

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/s/ Patrick Buelna
PATRICK M. BUELNA
COUNSEL FOR PLAINTIFFS

1 Date: July 23, 2021

2 **RIVERA HEWITT PAUL LLP**

3 /s/ Shanan Hewitt (as authorized on 07/23/21)

4 SHANAN HEWITT

5 COUNSEL FOR DEFENDANT

6 COUNTY OF STANISLAUS

7 **ORDER**

8 Pursuant to the parties' stipulation, and good cause appearing, the request to modify the
9 Scheduling Order deadlines to complete expert discovery and to file dispositive motions is
10 GRANTED. The deadline to complete expert discovery is extended to **August 16, 2021**, and the
11 deadline to file dispositive motions is extended to **October 5, 2021**. The pretrial conference remains
12 as scheduled on January 24, 2022.

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14 IT IS SO ORDERED.

15 Dated: **July 26, 2021**

16 /s/ *Barbara A. McAuliffe*

17 UNITED STATES MAGISTRATE JUDGE
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